

SEP 24 1999

September 22, 1999

Mr. Lester Snow, Executive Director  
 CALFED Bay-Delta Program  
 1416 9th Street  
 Sacramento, CA 95814

Attention: Mr. Rick Breitenbach

Re: Comments on the EIS/EIR for the Bay-Delta Program

Dear Mr. Snow:

Castaic Lake Water Agency (CLWA) is one of the 29 public agencies that hold contracts or rights for water deliverable by the State Water Project.

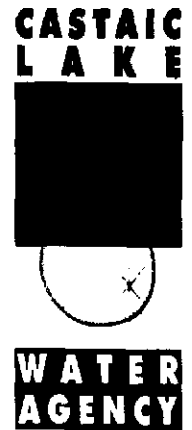
CLWA serves water within a 195 square mile area within northern Los Angeles County and southern Ventura County. The Agency's present population of 180,000, centered largely in or adjacent to the City of Santa Clarita, is expected to almost double within the next decade.

CLWA endorses and adopts as its own the comments provided by the State Water Contractors on the draft programmatic EIS/EIR for the California Bay-Delta Program. CLWA, in that regard, explicitly wishes to emphasize the need to chart a long-term course that will benefit both people and the environment in which they live.

The environmental review processes of the state and federal governments have joint objectives of creating informational documents sufficiently comprehensive so that both the general population and governmental decision-makers understand the full environmental consequences of their respective decision-making.

The EIS/EIR environmental document needs to discuss and analyze whether the currently structured decisional process is so unnecessarily complex and convoluted as to virtually guarantee decisional paralysis, except in crisis or panic situations.

A structured process of decisional paralysis is itself a decision -- being specifically a decision to do nothing truly major and substantive "on the ground" (except as a result of a crisis or panic) which affirmatively benefits both people and the environment in which they live.



#### DIRECTORS

E.G. "JERRY" GLADBACH  
 WILLIAM J. MANETTA, JR.  
 DONALD R. FROELICH  
 DEAN D. EFSTATHIOU  
 WILLIAM C. COOPER  
 ROBERT J. DIPRIMIO  
 RICHARD W. BALCERZAK  
 MICHAEL A. KOTCH  
 WILLIAM PECSI  
 PETER KAVOUNAS  
 ED DUNN

#### GENERAL MANAGER

ROBERT C. SAGEHORN

#### ATTORNEY

ROBERT H. CLARK

#### SECRETARY

LINDA J. FLEMING

"A PUBLIC AGENCY PROVIDING RELIABLE, QUALITY WATER AT A REASONABLE COST TO THE SANTA CLARITA VALLEY"

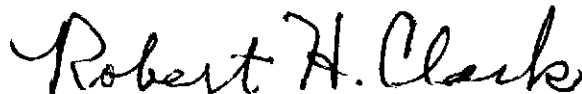
Mr. Lester Snow, Executive Director  
September 22, 1999  
Page Two

"Governance in the middle" need not and should not -- and hopefully will not -- be limited to band-aid approaches which ignore the very substantial population increases nearly universally projected for the State of California.

- Water supply targets (and timing) are missing from the DEIS/EIR. This is a fatal deficiency, because a "real" project must necessarily operate within time and space. Stated differently, facilities must be constructed. The detrimental environmental consequences are significant of failing to clearly acknowledge whether construction decisions or water allocation decisions will be made while California's population is approximately 30 million -- or later, when it is double that number.
- Complete elimination from environmental analysis of the "isolated Delta transport facility" alternative is improper, and constitutes an abuse of discretion based upon substantially artificial time frame analyses. The public has a right to know the good, bad, and the ugly of the "isolated facility" option. Delaying such environmental analysis to a later stage is antithetical to a complete environmental review process.
- Without quantified benefits to users during Stage 1, it is unrealistic and possibly legally improper to assume the use of user fees.

CLWA again specifically commends serious consideration to the thoughtful, balanced comments of the State Water Contractors.

Very truly yours,



Robert H. Clark  
General Counsel-CLWA